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ARNOLD SCHWARZENEGGER
GOVERNOR

August 6, 2008

Ms. Jo Webber, Director
Sonoma County Human Services Department
P.O. Box 1539
Santa Rosa 95402-1539

Dear Ms. Webber:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewers from our office during the course of the Civil Rights Compliance Review of last June. We apologize for the delay in providing you the review. Enclosed is the final report.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Mimi Rudin, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
COUNTY OF SONOMA HUMAN SERVICES DEPARTMENT
Conducted June 2008**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
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Reviewers

**Jim Tashima
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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Sonoma County Human Services Department with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on June 23-26, 2008 with an introductory meeting held with Mimi Rudin, Civil Rights Coordinator. An exit interview was held with Mimi Rudin and other managers on June 26, 2008, to review the initial findings.

The review was conducted in the following Santa Rosa locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Zephyr Building	3725 Westwind	In-Home Support Services and Adult Protective Services	Spanish
Family, Youth, and Children's Building	1747 Copperhill Parkway	Child Welfare Services	Spanish
Mendocino Building	520 Mendocino	Food Stamps	Spanish
Paulin Drive Building	2550 Paulin Drive	Food Stamps, Sonoma WORKS	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the preceding Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff

- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	9	3
Children Social Workers	3	1
Adult Program Workers	6	3
Receptionist/Screeners	3	2
Total	21	9

An additional 2 interviews were scheduled but were not conducted due to staff unavailability or illness.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	16
Non-English or limited-English speakers' case files reviewed	72
Languages of clients' cases	Farsi, Thai, American Sign Language, Vietnamese Spanish, Japanese, Portuguese Cambodian, Korean, French

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement.

The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			IHSS and APS at 3725 Westwind indicated applications are taken by phone or home visits. The SonomaWorks, TANF and Food Stamps managers responding for 520 Mendocino, 2550 Paulin and 2225 Challenger indicated that clients can telephone, fax, mail or use an authorized representative. One manager indicated that they use home visits as needed.
Does the county have extended hours to accommodate clients?		X		IHSS and APS at 3725 Westwind indicated that they do not have extended hours.

				<p>For the SonomaWorks, TANF, Food Stamps offices at Paulin, Mendocino and Challenger Way buildings, one survey respondent indicated no extended hours were available, and the other indicated hours as early as 7:00 AM or as late as 5:30 PM.</p> <p>The Child Welfare Services manager indicated that workers “routinely make after hours visits/weekend visits to accommodate client schedules.”</p>
Can applicants access services when they cannot go to the office?	X			
Does the county ensure the awareness of available services for individuals in remote areas?				They use outreach to senior centers and community agencies, and use brochures, website, press releases, community forums and presentations.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13)?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			<p>Although the manager responding for Adult Protective Services indicated that the social workers hand out the Pub. 13, none of the interviewed APS workers indicated that they distributed or explained the pamphlet.</p> <p>One Child Welfare Services worker does not give out the Pub 13, under the assumption that the ER worker does it before she gets the case, although she admitted to not having seen any documentation supporting her assumption.</p>
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			<p>At all facilities, Spanish and English were on display in the lobby, and the other languages were available in a binder from reception for copying on request.</p> <p>However, there is no method for a client who speaks a language other than English or Spanish to know that the Pub 13 is available at the reception desk.</p>

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				The other languages must either be displayed, or signage informing the clients of their availability and how to get one should be posted
Was the Pub 13 available in large print, audiocassette and Braille?	X			At all reviewed facilities, all items are available at the Reception Counter.
Were the current versions of the required posters present in the lobbies?		X		At all facilities reviewed, the poster "And Justice For All", #475B, is missing.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		Ten interviewees did not know of the existence or of the location of the poster.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		<p>At 3725 Westwind, several signs were not translated into Spanish. Examples include Employees Only, IHSS Timesheets, etc.</p> <p>At 520 Mendocino, several informational and directional signs at the entrance were not translated into Spanish. Examples include No Smoking and County of Sonoma Human Services Department.</p>

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				<p>Lobby signage was translated into Spanish.</p> <p>At 2550 Paulin, a number of signs were not translated into Spanish. Examples include Authorized Personnel, Press To Open, labels on the drop box, etc.</p> <p>At 1747 Copperhill, a number of signs were not translated into Spanish. Examples include No Admittance, No pets allowed except service animals, Please silence your cell phone, Welcome—Please register, etc.</p>

B. Corrective Actions

Informational Element	Corrective Action Required
Posters	<p>County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.</p> <p>Div. 21-107.211</p>

Informational Element	Corrective Action Required
Directional signage	County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

C. Recommendation

1. The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website
http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

2. With regard to the display of the Pub 13 pamphlet to ensure that LEP clients know in what languages the pamphlet is available, we have seen three workable solutions. One is where the county displays all the Pub 13 pamphlets in all the languages available in plastic multiple pamphlet holders that can hold several dozen of each language. Another possibility is to display one copy of the Pub 13 in each language on a bulletin board, with instructions next to each pamphlet in each language on how and where to get their own copy. The third possibility is to display a copy of the pamphlet on a bulletin board with a poster in multiple languages that indicate what the pamphlet is about, and where and how to get their own copy, all written in the language of each of the pamphlets.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 3725 Westwind

Facility Element	Findings	Corrective Action
Client lobby	Pressure required to open door into lobby measured 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Client lobby	Counter top is 39" high and not accessible.	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349
Men's Restroom: Signage	The accessible wall sign was mounted 56 " above the floor. The accessible door sign was mounted 52" above the floor and was missing the International Symbol of Accessibility (ISA) and Braille.	Door sign and wall sign shall be 60" above the floor. For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263

		<p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Men's Restroom: Door Pressure	Pressure to open restroom door measured 15 lbs.	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>
Men's Restroom: Accessible Stall	Toilet tissue dispenser is 20" from front edge of toilet.	<p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>
Women's Restroom: Signage	The accessible wall sign was mounted 55 " above the floor. The accessible door sign was mounted 53" above the floor and was missing the International Symbol of Accessibility (ISA) and Braille.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>

Women's Restroom: Door Pressure	Pressure to open restroom door measured 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom: Accessible Stall	The toilet tissue dispenser measured more than 12" from the front edge of the toilet.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA- ACRM 1115B.9.3) pp. 275, 269

Facility Location: 520 Mendocino

Facility Element	Findings	Corrective Action
Route to Main Door	Ramp to main door is only 45" wide, and does not have any hand railings.	<p>Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant. (CA T24 1133B.7.1) p. 160</p> <p>The width of ramps is as required for stairways and exits. Pedestrian ramps have a minimum width of 48" (CA T24 1133B.5.2.1)</p> <p>If a ramp run has a rise greater than 6" or a horizontal project greater than 6', then it shall have handrails on both sides. (CA T24 1133B.5.5.1, ADA 4.8.5)</p> <p>Handrail is mounted 34" to 38" above ramp. (CA T24 1133B.5.5.1, ADA 4.8.5(5))</p>

		<p>Cross section of rails is 1 ¼" to 1 ½" or have a shape that provides an equivalent gripping surface. (CA T24 1133.B.5.5.1, ADA 4.26.2)</p> <p>Handrail surfaces shall be smooth with no sharp corners. (CA T24 1133B.5.5.1, ADA 4.26.4)</p>
Exterior entrance	Exterior entrance does not have an ISA.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p>
Entrance Doors: Pressures	Pressures for all four entrance doors ranged from 13 lbs to 16 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Client Interview/Meeting Rooms	Due to furniture arrangement, rooms were not accessible. Door pressure on one room that was not being used measured 12 lbs.	Clear width, minimum clearance of a point is 32" (CA T24 1118B.1, ADA 4.2.1) p. 217

	Discussions were held during this review to select one room and make it accessible, establish procedures to maintain its accessibility, post the appropriate ISA on the room, and ensure that disabled clients use that room.	<p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217</p> <p>Minimum seating knee space [at tables and desks] is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p. 349</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>
Men's Restroom: Signage	Door and wall signs were not 60" from the floor.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Men's Restroom: Door Pressure	Door pressure measured 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

Women's Restroom: Signage	Door and wall signs were 55" from the floor.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
Women's Restroom: Door Pressure	Door pressure measured 12 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom: Accessible Stall	Toilet tissue dispenser was 16" from front of toilet.	<p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269</p> <p>Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269</p>
Emergency Alarms	Staff did not know whether emergency alarms were both audible and visual. They agreed to research the question and report their findings.	If emergency warning systems are required, they shall activate a means of warning the hearing impaired. (CA T24 1114B.2.4, ADA 4.28.1) p. 221

Facility Location: 2550 Paulin

Facility Element	Findings	Corrective Action
Route to Entrance	Tree branches overhang walkway below 80"	Pedestrian ways have a min. clear head room of 80" above the walking surfaces. As measured from the bottom of the obstruction. (CA T24 1133B.8.2) (ADA 4.4.2)
Foyer	First lobby where receptionist stands has a counter that is 46.5 inches high and is not accessible. Wheelchair users are currently forced to come to the side of the counter to do business, where they also partially block the pedestrian walkway to the inner lobby.	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349 The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30" x 48". (CA T24 1118B.4)
Client lobby	Due to arrangement of furniture, traffic aisles were 31" and 12" wide.	Circulation aisles and pedestrian ways shall be sized according to functional requirements and in no case shall be less than 36" wide. (CA T24 1105B.3.6.1) p. 60
Client Interview Rooms: Entrance and Exit	Pressure for the "in" door was 7 lbs; pressure for the "out" door was 6 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195

<p>Client Interview Rooms</p>	<p>Interview rooms were not accessible. Largest entry was measured at 30^{3/4}" wide.</p> <p>Room #9 was discussed as a possible designated accessible room, but entry door measured 29" wide. For a room to be designated as accessible, furniture will have to be rearranged to allow accessible space, and have appropriate accessible signage mounted. Procedures will have to be established to ensure staff maintain the space as accessible.</p>	<p>Clear width, minimum clearance of a point is 32" (CA T24 1118B.1, ADA 4.2.1) p. 217</p> <p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217</p> <p>Minimum seating knee space [at tables and desks] is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p. 349</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>
<p>Client Interview Rooms: SFIS Room (#29)</p>	<p>Room 29 is set up as the SFIS room for fingerprinting. It is not accessible. The doorway measures 28 1/2" wide and there is not a 60" diameter wheelchair turning space.</p>	<p>Clear width, minimum clearance of a point is 32" (CA T24 1118B.1, ADA 4.2.1) p. 217</p> <p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217</p> <p>Minimum seating knee space [at tables and desks] is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p. 349</p>

Telephone	In-house phones are provided in the lobby, but none of them have volume controls.	<p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control. (CA T24 1117B.2.8) (ADA 4.1.3.17(b))</p> <p>Telephone with volume control shall be hearing aid compatible and identified with a sign showing a handset with radiating soundwaves. (CA T24 1117B.2.8 & 1117B.5.8.3) (ADA 4.1.3.17(b))</p> <p>Phone cord shall be min. 29" long. (CA T24 1117B.2.11) (ADA 4.31.8)</p> <p>Side reach telephone; highest operable part max 54" above floor. (CA T24 1117B.2.6 & 1118B.6) (ADA 4.31.3 & 4.2.6)</p> <p>Forward reach telephone; highest operable part max. 48" above floor. (CA T24 1118B.2.5) (ADA 4.31.3 & 4.2.5)</p>
Telephone	One pay phone is provided. It has a volume control to assist in hearing that is not working. There is no signage to indicate an accessible phone.	<p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17(b)) p. 253</p> <p>Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8 & 1117B.5.8.3, ADA 4.1.3.17(b)) p. 253</p>

Men's Restroom	Door requires 14 lbs of pressure to open.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Men's Restroom: Accessible Stall	Toilet tissue dispenser was 26" away from the front edge of the toilet, and at a height of 41".	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA-ACRM 1115B.9.3) pp. 275, 269 Toilet paper dispenser minimum height from floor is 19". (ADA 4.16.6) pp. 275, 269
Women's Restroom	Door requires 14 lbs of pressure to open.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
Women's Restroom	Drain pipe under sink was not wrapped.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267

Facility Location: 1747 Copperhill

Facility Element	Findings	Corrective Action
Parking	Accessible spaces measured 17'6" long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135

Parking	Ramps extend 5' into the access aisle.	<p>Arrangement of parking space. In each parking area, a bumper or curb shall be provided and located to prevent encroachment of cars over the required width of walkways. Also, the space shall be so located that persons with disabilities are not compelled to wheel or walk behind parked cars other than their own. Pedestrian ways which are accessible to persons with disabilities shall be provided from each such parking space to related facilities, including curb cuts or ramps as needed. Ramps shall not encroach into any accessible parking space or the adjacent access aisle. This maximum cross slope in any direction of an accessible parking space and adjacent access aisle shall not exceed 2% (CA T24 1129B.4.3) (ADA 4.7.8)</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136</p> <p>Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p>
Parking	There are two non accessible slots between the accessible slots and the entrance.	Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131

Exterior entrance	The building is large with multiple entrances. It is not immediately clear which direction one would go to get to the accessible entrance. The ISA at the main entrance may not be clearly visible from the parking lot depending on where a person is standing.	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p>
Entrance Doors	The force to open main entrance doors measured 13 lbs and 15 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Client Interview Rooms	The force to open doors in four of the 6 rooms exceeded accessible requirements at 15 lbs, 18 lbs, 17 lbs and 15 lbs. The other two rooms were in use and not measured.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Unisex Restroom	Door sign was mounted at 53" from floor and the wall sign was mounted at 55" from floor.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24</p>

		1117B.5.7, ADA 4.30.6) p. 263 Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263
Unisex Restroom	Door pressure measured 18 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Unisex Restroom	There was a stepladder blocking access for the sink. It may be there for the use of children. Facilitating the use of the sink for children is encouraged, however the process cannot be allowed to block wheelchair access to the sink.	A clear floor space of 30" by 48" is provided with clear floor space and an accessible route. (ADA 4.24.5) p. 311 A minimum knee clearance of 27" high, 30" wide, and 19" deep is provided underneath sinks. (ADA 4.24.3) p. 311
Unisex Restroom	Toilet height measured 14 "from floor.	Height of water closet is 17" to 19" measured from the floor to the top of a maximum 2" high toilet seat. (CA T24 1115B.2.1, ADA 4.16.3) pp. 293, 285

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact?	X			
Does the county use a primary language form?	X			County uses HSD1259, which covers oral and written language needs, and auxiliary aids as well.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			

Question	Yes	No	Some-times	Comments
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			In one case, the program manager identified one Chinese speaking employee who helps out with Chinese speaking clients, but is not yet certified. The County is looking for outside resources to get her certified.
Does the county have adequate interpreter services?	X			Managers on the CalWorks/Food Stamps side indicated they felt they had adequate interpretive services. Managers of Child Welfare Services, Adult Protective Services and In Home Supportive Services indicated they felt the need for more bilingually certified staff. However, all staff have the Language Line service available.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			

Question	Yes	No	Some-times	Comments
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Some workers indicated that even if the client brought an interpreter, they would make sure that they had a department provided person to ensure good communication.
Does the county use the CDSS-translated forms in the clients' primary languages?		X		<p>In the SonomaWorks program, the following forms were used in English instead of the appropriate language (in parentheses) followed by number of occurrences:</p> <p> QR2 (Vietnamese)—17 QR377.1(Spanish)--1 QR377.1(Vietnamese)—3 QR377.2(Vietnamese)—1 QR377.4(Spanish)--1 QR377.4(Vietnamese)—28 QR7(Vietnamese)--3 CW61(Vietnamese)—2 CW61A(Vietnamese)--1 CW61B(Vietnamese)—1 DFA377.10(Vietnamese)--1 DFA377.1A(Vietnamese)—1 M40-171D(Vietnamese)—1 M44-340(Vietnamese)—1 M44-352A(Spanish)--1 M44-352A(Vietnamese)--1 NA825(Vietnamese)—1 NA960 YQR(Vietnamese)--4 TEMP2215(Vietnamese)—1 </p>

Question	Yes	No	Some-times	Comments
				<p>Of note in the above Spanish cases is that the overwhelming number of documents sent out were in the appropriate language. For example, in one case only 2 out of 36 documents were in the wrong language. In another, 95% of the documents were in Spanish.</p> <p>In the Non Assistance Food Stamps program, the following forms were used in English instead of the appropriate language (in parentheses) followed by number of occurrences:</p> <p>CW2.1(Spanish)—1 CW2.1Q(Spanish)--1 NA960 Y QRFS(Lao)—4 QR2(LAO)—1 QR2(Spanish)--3 QR377.1(Lao)—2 QR377.1(Spanish)—7 QR377.1(Vietnamese)--4 QR377.2(Lao)—1 QR377.4(Spanish)—11 QR377.4(Vietnamese)--2 QR7(Lao)—4 TEMPNA1232(Spanish)—1</p> <p>At 520 Mendocino, 1 case record showed that all forms used that had been translated by CDSS had been sent to the client, and 2 cases had all but two forms in the appropriate language.</p>

Question	Yes	No	Some-times	Comments
				All cases reviewed from 2550 Paulin used the appropriate translated forms.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Several examples of this were seen. However, due to the limitations of CALWIN, we were unable to verify the extent to which inserts in NOA's were in the correct language.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			Some workers did not know of the existence of TDD devices or the Relay system. Others did not know how to use them or never had used them.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

B. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	Sonoma County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2
Notices of Action	When the county uses translated forms and materials, such as notices of actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

C. Recommendation

1. Although significantly improved since the last review, there are still problems in insuring that CDSS translated forms are used in the appropriate cases. Whether this is a systems issue or a worker issue should be studied and corrective action taken.
2. Management should ensure that all public contact workers know the location of auxiliary aids for the disabled public, and how to use them.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Most ethnicities were documented in CWS/CMS. Additionally, we found ethnicity documented on the referral form, IN-ERREFR, SOC 158A, SS 8572, HSD 737,	Of 14 APS cases, 8 did not indicate ethnic origin documentation. Of those that did, sources included an Incident Report, Client Case History, and the SOC 341.	Documentation of ethnicity was found in CALWIN for all cases.	Documentation of ethnicity was found on the SAWS 1 or in CALWIN for all cases except 2 cases from 2550 Paulin that were lacking documentation of ethnicity.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
		All IHSS cases were documented on the SOC 295.		
Primary language documentation	<p>Primary language was documented in CWS/CMS. Additionally, we found language documented on the referral form, IN-ERREFR, SOC 158A, and SS 8572.</p> <p>Unfortunately, the HSD 1259 Language Preference Form was only found in 3 of the reviewed cases.</p>	<p>All APS cases were documented on the SOC 341. The HSD1259 Language Preference Form did not appear in any of the APS cases.</p> <p>All IHSS cases were documented on the SOC 295. The HSD1259 Language Preference Form was used in all of the IHSS cases.</p>	<p>Primary language was documented in CALWIN and in the HSD 1259.</p> <p>Of note, the HSD 1259, Language Preference Form could not be found in two cases.</p>	<p>Primary language was documented in CALWIN and in the HSD 1259.</p> <p>Four cases from 2550 Paulin and one case from 520 Mendocino lacked the HSD 1259.</p>
Method of providing bilingual services and documentation	Documentation in nine of the reviewed cases was good. Workers indicated how interpretive services were provided, and/or in what language the interaction was conducted.	Documentation in APS cases was either sporadic or non-existent. One case had good documentation; otherwise it is unknown how interpretive services were provided.	Good documentation in 6 cases, 5 of which were bilingual workers, and one was done by a telephone interpreter.	In all of the reviewed cases from 2550 Paulin that requested interpretive services, we were unable to find any documentation of how the services were provided.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
	<p>Both interpreters and bilingual staff were used.</p> <p>In 5 cases, we were unable to find documentation of how interpretive services were provided.</p>	<p>Although documentation of interpretive services was much better in IHSS cases, 3 cases still had no documentation of how interpretive services were provided.</p>	<p>In three cases, documentation was sporadic, where, for example, two interactions were documented and a third was not. Interpreters included family members and a telephone interpreter.</p>	<p>In nine cases from 520 Mendocino we were also unable to find any documentation of how services were provided.</p> <p>In two cases from 520 Mendocino, the HSD 1259 indicated that the client requested a Spanish interpreter, but CALWIN showed the primary language as English. In another 2 cases from 520 Mendocino, we found occasional but not consistent documentation in case comments.</p>

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Client provided own interpreter	One case was found.	In one APS case a Business Associate was used as an interpreter. In 3 IHSS cases, client provided family member as interpreter.	Two cases were found, both were older children of the client.	One case found from 520 Mendocino.
Method to inform client of potential problem using own interpreter	No documentation of such in the case.	No documentation of such in APS cases. 5 IHSS cases documented such a warning.	No documentation of such in the cases.	Mentioned in case comments.
Release of information to Interpreter	In the case where the client provided an interpreter, the signed consent for release of information was not found.	No evidence of release. IHSS cases used the HSD 676 for their release of information.	One case had a signed release, the other did not.	Yes.
Individual's acceptance or refusal of written material offered in primary language	The only explicit documentation of this were those 3 cases in which we found the HSD 1259.	IHSS uses HSD 1259 which includes written language preference.	Documented in the HSD 1259. In cases where the HSD 1259 was not present, no documentation of this.	Documented in the HSD 1259. In cases where the HSD 1259 was not present, no documentation of this.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Documentation of minor used as interpreter	County does not allow use of minors. No evidence of use of minor in case files.	In several cases in both programs, a daughter or son was used, but no indication of the age of the person.	County does not allow use of minors. No evidence of use of minor in case files.	County does not allow use of minors. No evidence of use of minor in case files.
Documentation of circumstances for using minor interpreter temporarily	N/A	None found	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	No findings to the contrary.	No findings to the contrary.	No findings to the contrary.	No findings to the contrary.
Method of identifying client's disability	HSD 1259, case comments, and in some cases, the HSD 737.	In APS, case notes were used. In IHSS, HSD 1259 and case notes/evaluation provided disability data.	Case comments indicated two cases with disability	One case from 520 Mendocino had a disability. Documentation found in the DFA 285. ASL interpreter requested. No HSD 1259 found, and unable to find CALWIN reference to disability or accommodation, except for one case comment citing the use of the relay

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
				service. No indication that an ASL interpreter was ever provided.
Method of documenting a client's request for auxiliary aids and services	HSD 1259 and case comments.	Used form HSD 1259 in IHSS.	<p>One disabled case did not have the HSD 1259 and did not document the client's request, although it was clear that the relay was used in two instances. In five other interactions there was no documentation of accommodation.</p> <p>In the other case, the file contained the HSD 1259, but no request for accommodation. CALWIN identified the client as disabled, but the type of disability was not indicated.</p>	See above.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipients' ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Sonoma County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Recommendation

1. The HSD 1259 Language Preference and Auxiliary Aid Identification Form is a good form. We would encourage its timely and periodic use across all programs and all cases to ensure explicit documentation of client preferences. We also would encourage its use anytime there is a change in the client's preferences. We also suggest that the county make it available in more than English and Spanish.

2. The documentation of the provision of interpretive services as a case develops should become more reliable and consistent. Attention should be paid to ACL 08-65, on the Documentation of Interpretive Services, dated December 31, 2008, which provides specific guidance to the necessary documentation.

3. When a client wishes to provide his or her own interpreter, the worker should ensure that the client is informed of the potential problems of ineffective communication (Division 21-116.23), and that the consent for release of information is obtained (Division 21-116.24). Both of these items must be documented in the case record.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			All interviewees but 1 Adult Social Worker indicated that they had Division 21 training in the last 6 to 8 months.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			A number of the workers referred to the 10 protected bases instead of the 12 protected bases.
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	Sonoma County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

C. Recommendation

1. The County should ensure that all public contact employees have had training in the requirements of Division 21.
2. The County should update its procedures and curriculum to reflect the **12** bases of discrimination: Race, Color, National Origin (includes language), Ethnic Group Identification, Religion, Age, Sex, Sexual Orientation, Marital Status, Domestic Partnership, Disability and Political Affiliation.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		Ten interviewees were not aware of the red-white and blue lobby poster showing where and how to file a complaint.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	Sonoma County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

C. Recommendation

1. Ensure that the each public contact employee sees the Pub 86 with the name of the Civil Rights Coordinator during their training, and that they are aware of where it is posted in their lobby.

IX. CONCLUSION

The CDSS reviewers found the Sonoma County Human Services Department staff warm, welcoming, informative and very supportive. Particular thanks to Mimi Rudin, Civil Rights Coordinator, for organizing the details of the review, and to Judith Merrin, Operations Manager, who assisted in each of the facility reviews. In each District Office, staffs were very helpful with the facility reviews, case reviews, and computer assistance

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. CDSS Civil Rights Bureau staff is available to provide technical assistance as requested.

The CDSS found the Sonoma County Human Services Department in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

For those items found that are not in compliance with the regulations and laws, Sonoma County Human Services Department must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.